

REMARKS

Reconsideration of all grounds of rejection, and allowance of the pending claims are respectfully requested in light of the above-amendments and the following remarks. Claims 1 and 3-11, as amended, remain pending herein. Claim 2 has been canceled without prejudice or disclaimer and its subject matter incorporated into claims 1 and 9.

The Abstract, which has been provided on a separate sheet (as requested by the Examiner), has been amended to remove reference numerals and certain terminology. No new matter has been added.

Claim 11 has been amended to recite a statutory claim in accordance with 35 U.S.C. §101, as well as the USPTO's own Guidelines for Computer-Related Examinations.

Claims 1, 5, 7, 9 and 10 stand rejected under 35 U.S.C. §102(e) in view of Lechat *et al.* (U.S. 6,999,629) (herein "Lechat"). Claims 2-3 stand rejected under 35 U.S.C. §103(a) in view of Lechat in view of Fowler *et al.* (U.S. 6,339,428) (herein "Fowler"). Claim 4 stands rejected under 35 U.S.C. §103(a) over Lechat in view of Fowler as applied to claims 1 and 2, and further in view of Zandi *et al.* (U.S. 6,219,458) (herein "Zandi"). Claim 6 stands rejected under 35 U.S.C. §103(a) over Lechat in view of Mochizuki *et al.* (U.S. 5,903,273) (herein "Mochizuki"). Claim 8 stands rejected under 35 U.S.C. §103(a) over Lechat in view of "Resample Hardware for 3D Graphics" by Meinds and Barenbrug, (herein "Resample Hardware"). Claim 11 stands rejected under 35 U.S.C. §103(a) over Lechat in view of Fowler. Applicant respectfully traverses of all these grounds of rejection for the reasons indicated herein below.

Claim 1 has been amended to recite in part:

wherein the step of applying the inverse affine transform is adapted to transform an intermediate point into an input transformed point in the input triangle, and to determine, for said intermediate point, an intermediate intensity value based on a filtering operation of texels surrounding the input transformed point.

Claim 9 has been amended to include a similarly worded recitation in an apparatus format; support these amendments is found at least in original claim 2, and the specification at least at page 6, lines 5-12.

The presently claimed invention provides a method and device for mapping an input image that includes, *inter alia*, the inverse affine transform being adapted to transform an intermediate point (e.g. $p0(n)$) into an input transformed point (e.g. $p1(n)$) and determines an intermediate intensity value based on a filtering operation of texels surrounding the input transformed point.

Although the combination of Lechat and Fowler have been alleged to render obvious original claim 2 (which is now incorporated into claims 1 and 9), Applicant respectfully disagrees with this ground of rejection. For example, Lechat and Fowler are silent with regard to determining an output intensity values of pixels surrounding said output transformed point on the basis of the intermediate intensity values, and wherein the *intermediate intensity value* for an intermediate point is based on a filtering operation of surrounding texels.

In the cited portions of the combination of references, Applicant respectfully submits that Lechat is admittedly silent even about a filtering operation, and in combination with Lechat, Fowler discloses use of surrounding color to determine the

color of a particular pixel in the video graphics primitive. The combination is silent with regard to the recited *intermediate intensity value*.

For at least the above reasons, Applicant respectfully submits that independent claims 1 and 9 are not anticipated by Lechat, nor would have been obvious in view of the combination of Lechat and Fowler, as the combination fails to disclose or render obvious the combination of elements as recited in these claims. Applicant further respectfully submits that claims 3, 5, 7 and 10 also are not anticipated by Lechat at least for the above reasons and because of an independent basis for patentability.

Reconsideration and withdrawal of all grounds of rejection under 35 U.S.C. § 102(e) are respectfully requested.

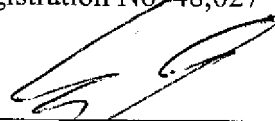
With regard to the rejections under 35 U.S.C. § 103(a), Applicant respectfully submits that the addition of any of the other cited references to the combination of Lechat and Fowler (or just one of Lechat or Fowler) still would not render the independent claims obvious at the time of invention, at least for the reason that none of the combination discloses, suggests, or in any other way renders obvious the recitations of the independent claims, and the additional recitations of the dependent claims. Nor would the combination of elements, as recited in any of the claims, have been obvious at the time of invention as being within the ordinary level of skill in the art ((*KSR International v. Teleflex*, 127 S.Ct. 1727, 82 USPQ2d 1385 (2007))).

Reconsideration and withdrawal of these grounds of rejection are respectfully requested.

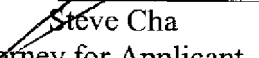
For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Respectfully submitted,

Aaron Waxler
Registration No. 48,027



Date: June 17, 2008

By: 
Attorney for Applicant
Registration No. 44,069

Mail all correspondence to:

Aaron Waxler, Registration No. 48,027
NXP, B.V.
NXP Intellectual Property Department
M/S41-SJ
1109 McKay Drive
San Jose, CA 95131
Phone: (408) 434-3000
Fax: (408) 474-9081